

# EXHIBIT 11

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# IFA's Charlottesville Case: *Sines v. Kessler*

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DEFENDANTS

LEGAL TEAM

Once in a generation, there is a trial that fundamentally changes our nation. We're taking on the leadership of the violent white nationalist movement – sending a clear message that violent hate has no place in our country.

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In August 2017, hundreds of white supremacists and neo-Nazis invaded Charlottesville, Virginia. This was not a peaceful protest but, rather, a meticulously planned conspiracy to bring violence to Charlottesville -- the result of months of online organizing, fueled by bigotry and hatred.

On August 11th, they marched with torches and surrounded a group of students and community members on the University of Virginia campus. White supremacists pushed, punched, and threw lighted torches. They chanted "Jews will not replace us," "blood and soil," and "this is our town now." Religious leaders at a nearby church sheltered in place fearing that they would be next.

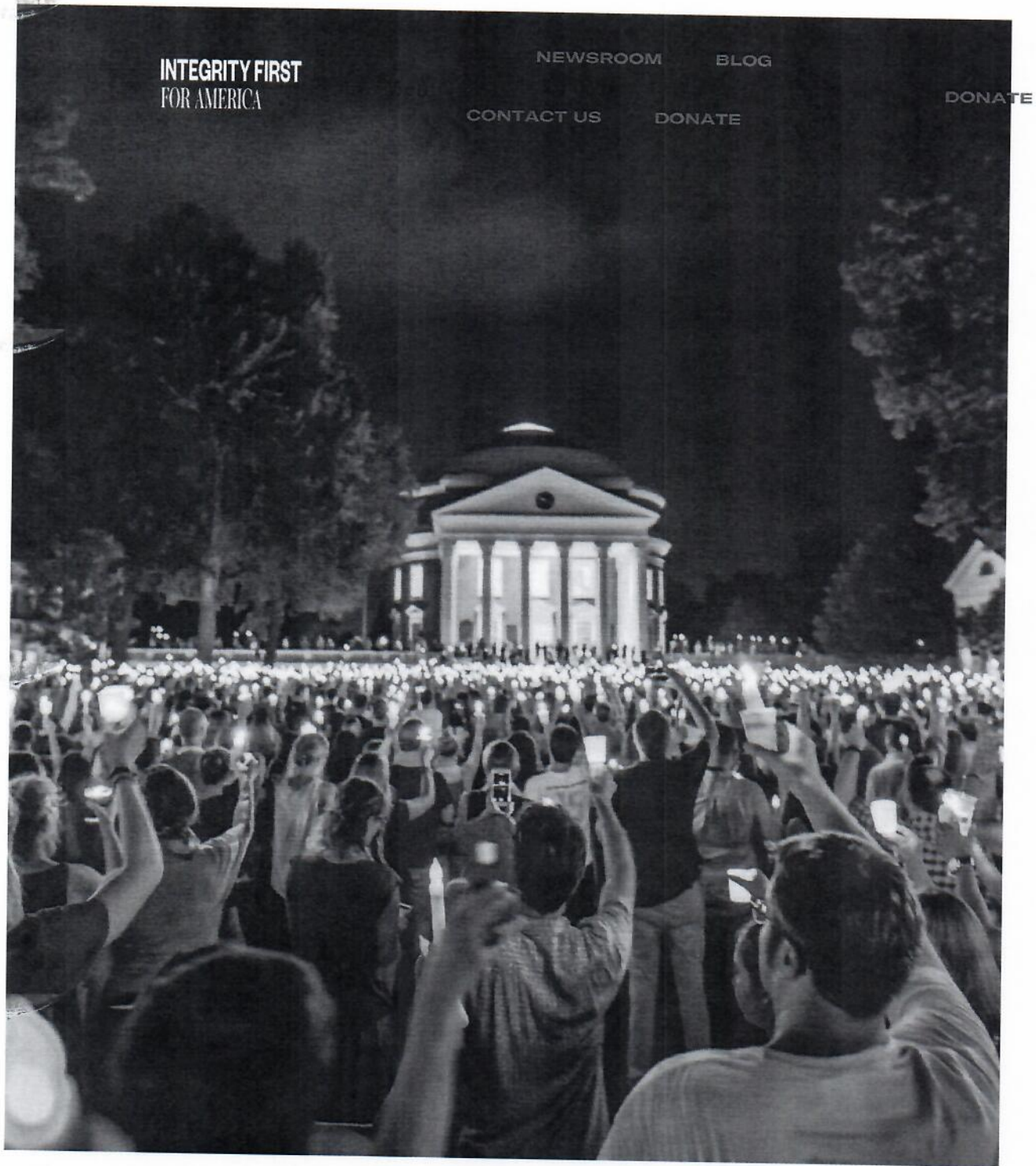
On August 12th, these white supremacists and neo-Nazis marched military-style to Emancipation Park, shouting racist, homophobic, and anti-Semitic slurs and carrying swastikas and other Nazi symbols. They charged through a line of interfaith clergy. They attacked and assaulted countless citizens. After police dispersed them, James Alex Fields Jr. drove his car into a crowd of peaceful protesters, killing 32-year-old Heather Heyer and injuring 19 others.

With this lawsuit, Charlottesville is fighting back. The court has already rejected the defendants' efforts to block this suit and trial is scheduled for this October 2020.

IFA's suit -- Sines v. Kessler -- is the only current legal effort to take on the vast leadership of the violent white nationalist movement. It sends a message to every hate group in the country: Americans will not give in to violence and hate. We will defend the dignity and equality of all people. And we will ensure this never happens again.







# Case Milestones

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**JUNE 23, 2020: COURT FULLY GRANTS CHARLOTTESVILLE PLAINTIFFS' MOTION TO COMPEL DISCOVERY FROM NEO-NAZI HATE GROUP NATIONAL SOCIALIST MOVEMENT**

A federal court fully granted plaintiffs' motion to compel discovery from neo-Nazi hate group National Socialist Movement. The court ordered NSM Commander Burt Colucci to identify and turn over all relevant social media accounts and electronic devices.

**MAY 27, 2020: COURT FULLY GRANTS CHARLOTTESVILLE PLAINTIFFS' MOTION TO COMPEL DISCOVERY FROM NEO-NAZI DEFENDANT JEFF SCHOEP**

A federal court ordered neo-Nazi Jeff Schoep to immediately turn over previously undisclosed phone, social media accounts, and other evidence — and also pay fees. Court warns he may face additional sanctions and contempt of court.

**MAY PLAINTIFFS' FINALLY NAZI**

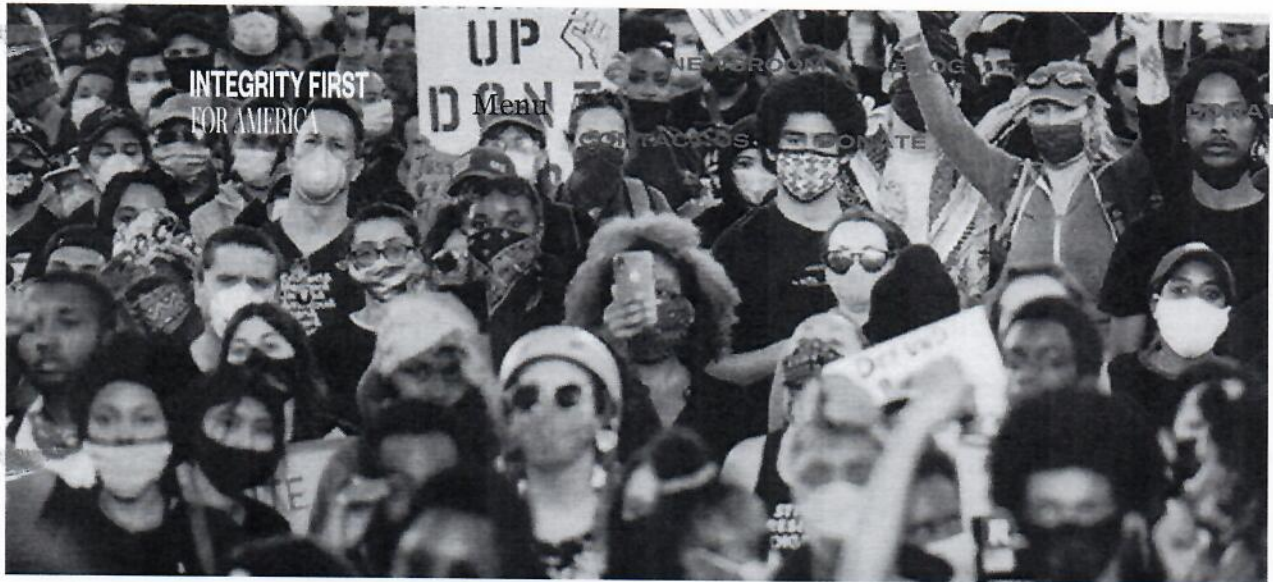
In a Charlottesville court hearing, Van... in fi left t sanc



## News & Media Coverage







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## White Supremacists and Other Extremists Exploiting This Moment







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## Court Fully Grants Charlottesville Plaintiffs' Motion To Compel Discovery From Neo-Nazi Hate Group National Socialist Movement



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### How is IFA's suit making an impact?

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## Case Documents

*Sines v. Kessler*: Amended Complaint

Opinion on Defendants' Motions to Dismiss

[VIEW ALL CASE DOCUMENTS](#)

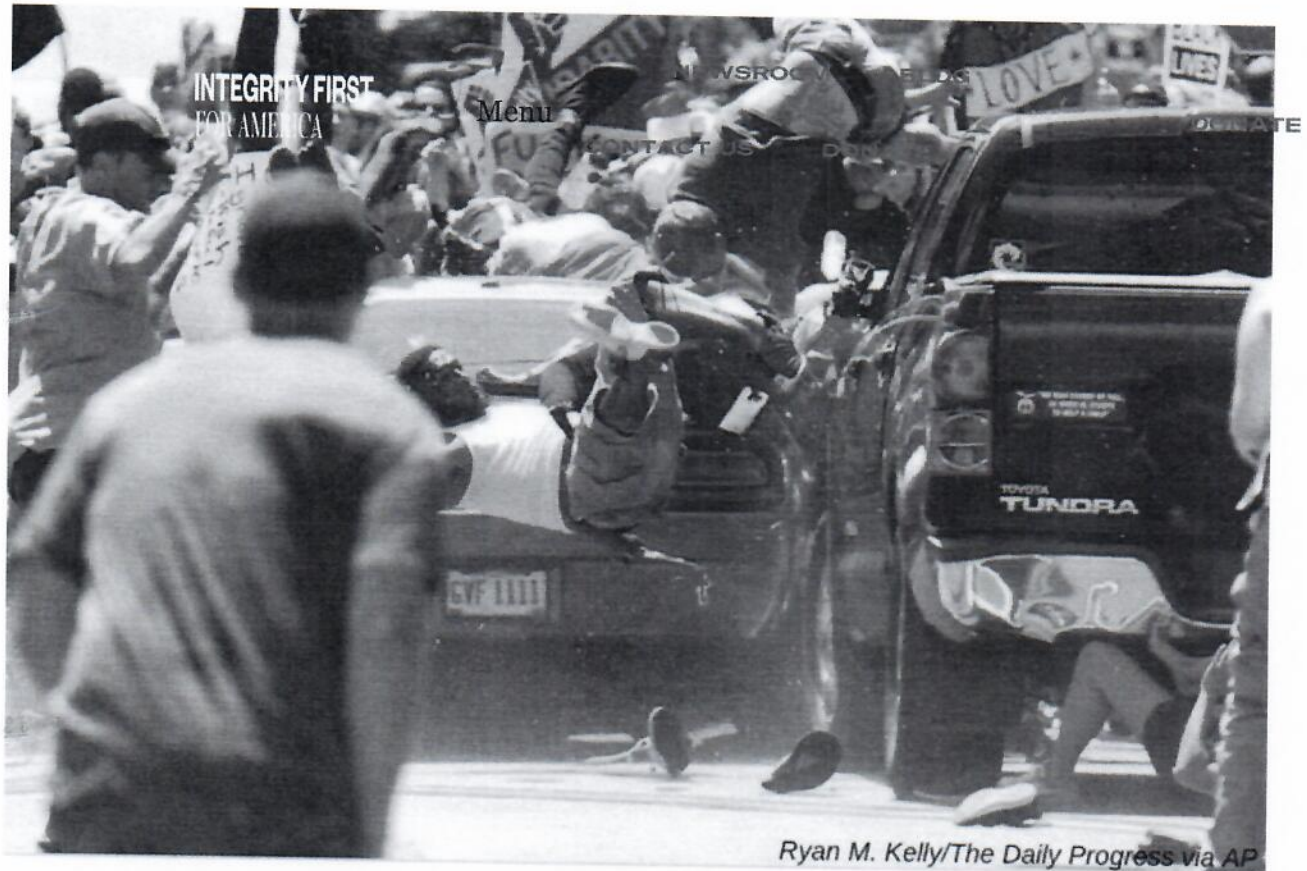
## The Charlottesville Case: Plaintiffs

Our plaintiffs are members of the Charlottesville community. They include parents, students, a Christian minister, and others who peacefully protested when white supremacists invaded their hometown. They were specifically targeted on the basis of their race, religion, and ethnicity or because they stood up for the safety and civil rights of others.

The plaintiffs were injured by the defendants, including a number who were grievously injured when James Alex Fields, Jr., drove his car into a crowd of peaceful protesters. As stated in the complaint, our plaintiffs hope "to ensure that nothing like this will happen again at the hands of Defendants—not on the streets of Charlottesville, Virginia, and not anywhere else in the United States of America."







MEET THE PLAINTIFFS

## The Defendants

Defendants are two dozen prominent white supremacists, neo-Nazis, and hate groups that planned, promoted, and executed the violent acts in Charlottesville. They came with clubs and shields, pistols and assault rifles, helmets and pepper spray. Defendants killed one woman and injured dozens more. They did not come to protest peacefully. They came with a plan to provoke violence.

Defendants include Jason Kessler, a white nationalist who led the organizing efforts; Richard Spencer, a white nationalist who believes in "ethnic cleansing"; Matthew Heimbach, a white nationalist who said, "Of course we look up to men like Adolf Hitler"; and James Alex Fields Jr., who drove the car that killed Heather Heyer; as well as hate groups like the Traditionalist Worker Party, Identity Evropa, and the League of the South.



Loyal White Knights Rally



# Legal Team

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IFA is providing financial support for the plaintiffs in this historic case, funding critical expenses such as evidence collection and security. The plaintiffs are represented by a team of lawyer from nationally-recognized law firms, led by Roberta Kaplan and Karen Dunn.



## Roberta Kaplan

Partner, Kaplan Hecker & Fink, LLP

Robbie is the founding partner of Kaplan Hecker & Fink LLP. Among other accolades, Robbie has been selected as one of "The 100 Most Influential Lawyers" in the United States, as "... [Expand](#) »





## Karen Dunn

Partner, Boies Schiller Flexner LLP

A member of the Executive Committee at Boies Schiller Flexner LLP, Karen is one of the top trial lawyers in America and has secured improbable victories in business-critical cases for some... [Expand »](#)

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